

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

BERNADINE T. GRIFFITH

Plaintiff,

v.

**ONEBEACON INSURANCE COMPANY,
ONEBEACON AMERICA INSURANCE
COMPANY, MICHAEL A. SISTO, and
KAREN ALLEN HOLMES**

Defendants.

C.A. No. 03-CV-12573-EFH

**DEFENDANTS' MOTION TO EXTEND TIME FOR
PRODUCTION OF THE EXPERT REPORT OF HARVEY S. WAXMAN, PH.D.**

NOW COME Defendants OneBeacon Insurance Company, OneBeacon America Insurance Company, Michael A. Sisto, and Karen Allen Holmes (collectively, "Defendants") who respectfully request a twelve day extension of the time for production of the expert report of Harvey S. Waxman, Ph.D. ("Dr. Waxman"), extending the date for production from Thursday, July 14, 2005 to Tuesday, July 26, 2005. As grounds for their motion, Defendants state that on May 18, 2005, the Court granted Defendants' Motion to Conduct a Rule 35 Examination of Plaintiff Bernadine T. Griffith ("Plaintiff"). Dr. Waxman completed his examination of Plaintiff on June 23, 2005, and his personal and professional calendar would be greatly eased by the additional twelve days for composition of his expert report.

The undersigned requested that counsel for the plaintiff state her position on the instant motion so that Defendants could apprise the Court of it in this filing, but counsel for Plaintiff has not responded. *See* Exhibit A, June 29, 2005 letter to Attorney Kathleen J. Hill.

WHEREFORE, Defendants respectfully request this Court extend the time for production of the expert report of Dr. Waxman by twelve days, extending the date of production from Thursday, July 14, 2005 to Tuesday, July 26, 2005.

Respectfully submitted,

ONEBEACON INSURANCE CO.,
ONEBEACON AMERICA INSURANCE CO.,
MICHAEL A. SISTO, and
KAREN ALLEN HOLMES

By their attorneys

/s/ Leah M. Moore
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Dated: June 30, 2005

CERTIFICATE OF SERVICE

I, Leah M. Moore, hereby certify that on June 30, 2005, I caused a true and correct copy of the foregoing to be served via first class mail upon Kathleen J. Hill, Esq., Attorney for Plaintiff, Law Office of Kathleen J. Hill, 92 State Street, Suite 700, Boston, Massachusetts 02109, being the address designated by said attorney for service of all pleadings.

/s/ Leah M. Moore
Leah M. Moore